ALIFORNIA ENERGY COMMISSION

16 NINTH STREET CRAMENTO, CA 95814-5512

October 16, 2001



Bruce E. Blowey Licensing Project Manager Southern California Public Power Authority 225 So. Lake Avenue, Suite 1410 Pasadena, CA 91101

Dear Mr. Blowey

MAGNOLIA POWER PROJECT 1st ROUND DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests (#1-65) is being made in the areas of air quality, biological resources, compliance, cultural resources, efficiency, noise, reliability, socioeconomics, traffic and transportation, and visual resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 5, 2001, or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Robert Laurie, Presiding Committee Member for the Magnolia Power Plant Project proceeding, and to me, within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (f)).

If you have any questions, please call me at (916) 653-1245, or E-mail me at ireede@energy.state.ca.us.

Sincerely,

James W. Reede, Jr. Energy Facility Siting Project Manager

Enclosure cc: POS

Technical Area: Air Quality

Author: William Walters and Lisa Blewitt

BACKGROUND

Based on Permit Application information submitted to South Coast Air Quality Management District (SCAQMD), staff is aware that a General Electric (7FA) turbine has been selected for this project. At the time the AFC was completed the final turbine selection between the General Electric (7FA) turbine and the Siemens-Westinghouse (501F) had not been completed, so the environmental analysis presented was based on the worst-case turbine. Additionally, there may be other major or minor changes to the project that may have occurred since the AFC was filed. Staff needs additional information to be assured that the project is being evaluated as currently proposed.

DATA REQUEST

- 1. Please identify any changes necessary to the air quality analysis based on the selected General Electric (7FA) turbine model. This should include any necessary revisions to the operating, startup and commissioning emission totals and revisions to the modeling results as necessary to reflect the turbine selection and any other changes to the project that may have occurred since the AFC was filed.
- 2. Please list any other revisions to the project or revisions to assumptions that affect the analysis of the project that would affect air quality emission or modeling results which have occurred since the AFC was filed. In particular, please clearly describe all sources to be added and decommissioned, with an anticipated schedule, as a result of the LM6000 turbine that is now proposed for the site.

BACKGROUND

The Magnolia Power Project (MPP) is designed to maximize the use of reclaimed water for cooling. However, the amount of reclaimed water that can be used is constrained by limitations contained in the City of Burbank's (COB) current National Pollutant Discharge Elimination System (NPDES) discharge permit for its wastewater treatment plant. COB discharge permit is currently being revised and the Applicant expects that the revised discharge limits will allow for higher cycles of concentration and maximum use of reclaimed water as the source of cooling tower make-up.

DATA REQUEST

3. Please update the cooling tower design basis (i.e. cycles of concentration and total dissolved solids), PM₁₀ emissions, and water consumption to match final discharge limits agreed to in the revised COB discharge permit.

BACKGROUND

In the AFC, the 1-hour NO_2 , 8-hour CO, and PM_{10} impacts from construction appear to be potentially significant (Table H.3-4, pg. H-77). The state 24-hour and annual PM_{10} standards, the national annual PM_{10} standard, and the 8-hour CO standards are being exceeded in the absence of construction emissions from the MPP. Additionally, there appears to be errors in the construction emissions calculations. Staff needs clarification of the construction emissions and modeling assumptions and additional modeling impact analysis to be able to assess the Applicant's analysis.

DATA REQUEST

- 4. The construction emissions modeling has incorporated hourly emission factors (i.e. temporal factors). Please describe the assumptions and calculations used to incorporate these hourly adjustments.
- 5. The diesel equipment SO₂ emissions (Appendix H.3.1, pg. H-81) appear to be based on 0.25% (2500 ppm) sulfur fuel (AP-42). This sulfur content is five times the California Motor Vehicle Diesel Standard. Please correct the emissions calculations and modeling results to reflect the use of 0.05% (500 ppm) sulfur diesel.
- 6. The modeled exhaust velocity (40 m/s) and exhaust temperature (644 K or 700 °F) for construction vehicles appears to be higher than can be reasonably expected. Please provide documentation to confirm these values.

BACKGROUND

In the AFC, the temporary 1-hour NOx impact from commissioning appears to be potentially significant (pg. 5.2-71). However, the applicant has concluded that the air quality impacts from commissioning will be insignificant. Staff needs additional information and clarification of specific technical issues to complete the review of the air quality impact analysis.

- 7. Please describe each commissioning activity listed in the table in Appendix H.12 on page H-178. Include the following additional information:
 - a. Please provide fuel consumption data for each commissioning event.
 - Please provide available vendor data and calculations to support the commissioning emissions including stack parameters for each commissioning event.

- c. Please provide a screening level modeling analysis of each of the commissioning events, using event specific exhaust parameters, to confirm that the modeling results do represent worst-case conditions.
- d. If this screening analysis indicates that another commissioning event represents worst-case, please remodel the commissioning emissions and present the revised modeling results.
- 8. Please provide additional description of the initial commissioning, including the maximum duration of the commissioning period and total heat rate and emissions for all criteria pollutants during initial commissioning that includes any changes in the estimates that may have occurred since the AFC was filed.

BACKGROUND

The Applicant has indicated that the project meets all Best Available Control Technology Requirements; however, the Applicant is proposing a higher VOC (i.e., precursor organic compounds, reactive organic compounds) concentration during duct firing than is recommended by CARB Guidelines for Power Plants and than has been recently permitted for any other similar project. Additionally, a recent BACT determination by USEPA (please see attached letter) suggests that for 7F frame turbine combined-cycle plants, USEPA considers BACT for NO_x to be 2.0 ppm (@15% O₂ 1-hour rolling average) and BACT for CO to be 2.0 ppm (@15% O₂ 3-hour rolling average). The Applicant is currently proposing a NO_x emission limit of 2.0 ppm (@15% O₂ 3-hour rolling average) and a CO emission limit of **6.0 ppm** (@15% O₂ 3-hour rolling average). Staff needs additional information to identify whether the project will meet BACT for VOC, NO_x, and CO.

- 9. Please identify why this project, as opposed to other proposed and certified projects cannot meet a VOC concentration of 2.0 ppm (@15% O₂ 1-hour rolling average) under all operating conditions as currently designed. Also please identify measures, including revising the maximum heat duty of the duct burners, that would allow the project to meet the BACT guideline level and a cost benefit analysis of such measures.
- 10. Please identify if the project will be able to meet USEPA's anticipated BACT determination for NO_x and CO emissions. Please identify if any additional control measures will be necessary to meet NO_x and CO emission limits of 2.0 ppm (@15% O₂ 1-hour rolling average) and 2.0 ppm (@15% O₂ 3-hour rolling average), respectively; and please provide a cost benefit analysis of any such control measures.

BACKGROUND

The project will provide emission offsets for all criteria pollutants in accordance with the applicable rules and regulations of the SCAQMD. Since this project will be subject to the (SCAQMD) RECLAIM program, NO $_x$ and potentially SO $_x$ emissions will be offset utilizing RECLAIM Trading Credits (RTCs). Since RTCs are provided through a market-based system, the project will obtain NO $_x$ and potentially SO $_x$ RTCs through purchases of the necessary SCAQMD-certified emission credits on the RECLAIM RTC market. Emission offsets for ROG, PM $_{10}$, CO, and potentially SO $_x$ will be provided through the acquisition of SCAQMD-certified Emission Reduction Credits (ERC) from the market-based ERC program. PM $_{10}$ and CO ERCs may be purchased through the District's priority reserve. Staff requires additional information regarding the status of the Applicant's offset package to adequately assess the effectiveness of the project's emission mitigation.

- 11. Please provide documentation from the SCAQMD RECLAIM program for the total number of SCAQMD-certified emission credits available from the RECLAIM RTC market to offset NO_x and SO_x emissions.
- 12. The certificate of transfer to Southern California Public Power Authority (SCPPA) was not complete at the time of AFC submittal for all RTCs and ERCs. Please provide copies of any option contracts, surrendered RECLAIM trading credits or emission reduction credits.
- 13. Please provide a table that clearly identifies the amount of RTCs/ERCs obtained from each source and the balance of credits needed to fully offset the project.
- 14. Please provide a final tally of the amount of PM₁₀ and CO ERCs that are proposed to be acquired from SCAQMD's priority reserve.
- 15. Please provide documentation that due diligence effort has been made to secure available RTCs and ERCs for each affected pollutant. This documentation must include:
 - a. records of all viable RECLAIM trading credit and emission reduction credit sources,
 - b. what parties were contacted, and,
 - c. the results of each attempt to obtain RTCs and ERCs from each party contacted.

BACKGROUND

In the AFC, there appears to be a few inconsistencies and errors. Staff needs clarification and correction of specific information provided to assess the application.

DATA REQUEST

- 16. The first paragraph on Page 5.2-84 of the AFC notes that the CO, VOC, PM₁₀ and SO₂ project emission rates are not significant in comparison to SCAQMD CEQA significance levels and references Table 5.2-54. However, Table 5.2-54 on Page 5.2-83 of the AFC shows that the CO, VOC and PM₁₀ emission rates are above their respective SCAQMD CEQA significance thresholds. Please clarify or correct this apparent inconsistency.
- 17. The startup/shutdown emission provided in Appendix H.4 show identical SO₂ emission rates of 1.12 lbs/hr; however, the PM₁₀ emission rates are noted to be 12 lb/hr for start-up and 18 lb/hr for shutdown. Please clarify or correct this apparent inconsistency.

BACKGROUND

In order for staff to complete its assessment of the project additional information regarding startup/shutdown is necessary.

- 18. Please identify why the shutdown NOx emissions are higher than the startup NOx levels.
- The cover letter submitted with the AFC the stated the followings..."as of April 19. 20th, 2001, the South Coast Air Quality Management District (SCAQMD) has revoked their one-hour significance level for nitrogen oxides. This significance level resulted in several restrictions on start up emissions that are reflected in the AFC. The Applicant will be submitting a revised air quality analysis reflecting the revised SCAQMD regulations." Elsewhere in the AFC (pg 5.2-43) it notes that the SCAQMD has proposed to change the significance levels for attainment. areas of NO₂. The project is within such as area. If the changes are adopted as currently proposed, the project may opt to not use the auxiliary boiler to preheat the SCR catalyst prior to startup. Additional ambient modeling would be performed to assess impacts with the auxiliary boiler under startup conditions". Please clarify the apparent inconsistency regarding the regulatory status of the one-hour NO₂ significance level. Also please identify if any changes to the startup assumption have been determined, and if so provide the supporting documentation and impact modeling files.

BACKGROUND

In order to assess the continuing air quality permitting issues under the timeframe for the assessment of this project, staff requires timely copies of all written communication between the Applicant and the District.

DATA REQUEST

20. Please provide all written project correspondence (including e-mails) relating to ERC's and District air quality permitting issues that have occurred to date between the District or USEPA and the Applicant, and as it occurs between the District or USEPA and Applicant until the final commission decision for this case.

Technical Area: Biological Resources Author: Natasha Nelson and Julie Colyer

Technical Senior: Jim Brownell

BACKGROUND

Tall structures such as power plant exhaust stacks can pose a threat to birds that might collide with them. In addition to the existing 150-foot tall exhaust stack, the MPP proposes to construct another 150-foot tall exhaust stack (Section 5.6, p. 5.6-8). Staff needs more information regarding the type and height of other existing tall structures on the surrounding MPP site in order to assess the potential impacts to bird species.

DATA REQUEST

21. Please provide the type and height of other existing tall structures (if any) on the COB's 23-acre site in which the existing generating facilities are located.

BACKGROUND

Lights can disorient migratory birds flying at night or attract wildlife, such as insects and insectivores. The proposed MPP exhaust stack may be lighted if the FAA requires lighting for aviation safety (Section 5.6, 5.6-8). Staff would like to know the status of existing lighting in the surrounding site and on the proposed MPP exhaust stack. This will help staff fully assess the potential for impacts to biological resources.

DATA REQUEST

22. Please provide staff with the following information regarding the COB's 23-acre site: 1) the amount (light, medium, heavy use) of lighting (with and without the proposed MPP); 2) the duration (time of night and days per year) of existing and proposed lighting; 3) whether or not the lighting on the existing and proposed stacks are/will be flashing; and, 4) the color of light on the existing and proposed structures.

BACKGROUND

The applicant states that the COB operates a reclaim water treatment plant that produces water to discharge into the Burbank Western Wash, a tributary to the Los Angeles River (Section 5.5, p. 5.5-5). It is also stated that this channel is 40 feet wide and 20 feet high and made of concrete (Section 5.6, p. 5.6-5). Staff would like to know what part of the channel is made of concrete. This will help staff fully assess the impacts to biological resources.

DATA REQUEST

23. Please provide staff information on which part(s) of the Burbank Western Wash is made of concrete (i.e. sides, bottom or both) and for what distance upstream and downstream from the water treatment plant outfall does the concrete continue.

Technical Area: Facility Closure

Author: Ila Lewis

BACKGROUND

Project Owner submitted a very brief section on Facility Closure. They addressed decommissioning, temporary closure and permanent closure. In order to meet compliance conditions for closure the following information is required.

- 24. Facility closure information is provided on page 3.10-1 of the AFC.
 - a. A description of the closure plan for temporary closure is required.
 - b. A description of the closure plan for permanent closure is required.

Technical Area: Cultural Resources

Author: Mary Maniery

BACKGROUND

Staff needs to ensure that the project complies with all Federal, State and local LORS. The AFC and the Cultural Resources technical appendix (Appendix J:1-2) note that while no permit requirements have been identified at a federal, state or local level, subsequent action could require federal involvement through a U.S. Army Corps of Engineers 404 permit or similar process that could necessitate compliance with Federal law 36 CFR Part 800 Regulations implementing Section 106 of the National Historic Preservation Act. At times permits or easements granted under state law include requirements regarding cultural resources. If there are no requirements concerning cultural resources included in an easement or permit, staff will need to know that to ensure compliance with law.

DATA REQUEST

- 25. Please identify whether general project activity(ies) or specific cultural resource activity (ies) at the project site or lay down areas may necessitate compliance with Section 106.
- 26. Please provide a schedule for in-lieu applications or easements required by state or local law.
- 27. Please identify any federal permits required for this project that are defined as a federal undertaking under 36 CFR Part 800, Section 106 of the National Historic Preservation Act.

BACKGROUND

The archaeological sensitivity or potential of a geographic locality is a function of local history and environmental factors. Prehistoric resources typically correspond to a number of environmental factors that include topography, proximity of necessary and desirable resources, including water, food, and technologically important materials, and proximity of other cultural sites. Confidential Appendix J pp. 3-3 refers to a stream channel that passed through the parcel.

DATA REQUEST

28. Please provide a discussion of the potential for buried or near surface archaeological resources in the project area. Note the former stream course through the project and consider its potential as an attractor for prehistoric activity, and its alluvial potential for burying archaeological resources.

BACKGROUND

The AFC Appendix J, page 3-2 discusses past residential land use of the power plant parcel and refers to Sanborn maps and a 1928 aerial photograph that depict a residence. Date of construction, owners, and initial development and use for this residence is not provided. In addition, Confidential Appendix J, p. 3-2 notes that power plant personnel reported the discovery of buried cultural and biological material including tree stumps and "evidence" of a cesspit to URS archaeologists at the presumed location of the dwelling. Staff needs additional information to complete the analysis.

DATA REQUEST

- 29. Please indicate on a site plan (Fig. 3 of JRP Historical Evaluation) the approximate location of any buildings and structures that once were present on the parcel. Include the approximate location of the cesspit and stumps found during previous construction activities on site under confidential cover.
- 30. Please address past construction activities in the areas of previous historic buildings on the project site. Include the depth of excavation or fill in relation to predicted depth of historical deposits.
- 31. Please address the historical archaeological potential of the project site, based on construction history and land use history.
- 32. Please provide information concerning the residence previously located on the project site. Please address the date the residence was established, initial owners, and use (e.g., agriculture, ranching).
- 33. Please supply copies of the relevant Sanborn maps and aerial photographs (referenced in the AFC p. 5.7-13 and Appendix J, page 3-2) used to identify historic buildings and structures.

BACKGROUND

To conduct a thorough analysis, staff needs supporting documentation to be able to agree or disagree with the applicant's findings.

DATA REQUEST

34. Please provide copies of the DPR 523 forms for all buildings, structures or objects older than 45 years of age within the Area of Potential Effect.

BACKGROUND

Staff needs clarification of construction procedures to complete the analysis.

DATA REQUEST

- 35. Please indicate on a figure of the site plan (Fig. 3 of JRP Hist Evaluation) areas where project related excavation will occur and the depth of that excavation.
- 36. Please identify areas of the project site where fill was previously added. Indicate the depth and location of the fill. Will fill be used in the proposed project? Where will the fill dirt be obtained? Please identify areas of the project site where fill will be used.

BACKGROUND

The AFC and Appendix J, page 4-2 recommend that an archaeological monitor be present subsequent to removal of paving, during initial grading and excavation activity in the northern quadrant of the plant site.

DATA REQUEST

37. Please provide a figure of the site plan (Fig 3 of the JRP Hist Evaluation) depicting the location of recommended archaeological monitoring areas.

TECHNICAL AREA: Reliability and Efficiency

Authors: Richard Minetto

BACKGROUND

Staff needs additional information regarding the reliability and efficiency performance for the above-mentioned project. The AFC provided by the applicant provides basic information necessary for review, and this request is intended to supplement the information contained within the AFC.

DATA REQUEST EFFICIENCY

38. Please provide information relevant to the use of alternatives considered for cooling systems. Include any assessment of dry cooling considered as an alternative to the proposed cooling system, and provide the efficiency differences between the proposed cooling system and the dry cooling alternative.

DATA REQUEST RELIABILITY

39. Please provide a description of the operation of the combined cycle block for a failure of the HRSG. Include with this description, the method of operating the plant with only the CTs, and include any estimated time constraints for having the CTs on line for a failure of the HRSG.

Technical Area: Noise Author: Fred Greve

BACKGROUND

The applicant identifies the impact criteria on page 5.12-6. Specifically, the fourth paragraph on this page identifies COB impact criteria for a number of locations. A brief explanation is presented at how those criteria are derived.

DATA REQUEST

40. Please provide a more detailed discussion of how the COB impact criteria is determined, particularly for site LT-2.

BACKGROUND

Table 5.12-3 identifies 9 categories of noise sources. The detailed worksheets in Appendix N identify 15 categories of noise sources. Some of the categories in Appendix N were grouped to come up with the categories in Table 5.12-3.

DATA REQUEST

41. Please provide a list of which categories in Appendix N were grouped to come up with the categories in Table 5.12-3. To better understand the discussion of the noise sources in Table 5.12-3 and the subsequent discussions of mitigation measures, staff needs to know the link between the detailed calculations in Appendix N and the summary tables in the main text.

BACKGROUND

On page 5.12-12a the following statement is made; "With incorporation of the limited mitigation measures listed in Table 5.12-6, the noise levels from operation of the MPP will comply with the COB and CEC noise criteria only if there were no legal, non-conforming residential properties within the industrially zoned area." This statement is unclear whether the project will or will not comply with the COB and CEC noise criteria.

DATA REQUEST

42. The noise analysis previously states that there are residences (e.g., LT-1) in the industrial zone. Does the COB noise ordinance treat these residences as an industrial zone or as a residential use? Please provide more discussion on whether the project with mitigation will or will not be able to achieve the COB and CEC noise criteria at the residences represented by LT-1.

BACKGROUND

In Appendix N, two spreadsheets are presented for "600 feet west of nominal acoustic center with mitigation." One calculation sheet shows a combined noise level of 47.3 dBA and the other 60.3 dBA.

DATA REQUEST

43. Please provide clarifications on what these two calculation sheets represent. Does one sheet represent "limited" mitigation, while the other represents a more intense level of mitigation?

Technical Area: Socioeconomics

Author: Negar Vahidi

BACKGROUND

CEQA requires a discussion of the potential direct and cumulative impacts of the proposed Magnolia Power Project (MPP) on local public services including, schools, police, and fire protection. Current staffing and resource inventory is required to conduct an accurate assessment of the potential impacts occurring due to construction and operation of the MPP.

DATA REQUEST

- 44. Burbank Police Department. Please provide the following police services information:
 - a. Identify the location of the closest police station to the proposed project;
 - b. Total number of Burbank Police Department stations;
 - c. Total number of full time officers; and
 - d. Current response time to project location.
- 45. Please indicate whether, or not, the BUSD believes the schools identified in the AFC (or affected by the proposed project) are at capacity, or below capacity.

BACKGROUND

The Socioeconomic analysis should include information regarding the cost of construction and the payroll for construction and operation. These costs will have socioeconomic impacts in the local and regional area.

DATA REQUEST

46. Please provide the total capital cost of the proposed project, and the construction and operation payroll.

Technical Area: Traffic and Transportation

Author: James Fore

BACKGROUND

Burbank Local Transit provides bus service for the City of Burbank. Several bus routes for the local area around the MPP have been identified in the AFC.

DATA REQUEST

- 47. Please address the following public transportation issues:
 - a. Please indicate for the local area around the MPP what streets are used for the routes referenced in the Bus Route section of Section 5.11.1.3.
 - b. Provide the location of any bus stops that would be impacted by construction activity.

BACKGROUND

The AFC indicates that most of the heavy equipment will be transported by rail. The rail deliveries will then be unloaded and transported to the site.

DATA REQUEST

- 48. Please respond to the following rail information requests:
 - a. Please indicate what rail lines will be used.
 - b. Indicate the equipment and unloading area.
 - c. Indicate the route that will be used to transport the equipment to the plant site.

BACKGROUND

Section 5.11.2.1 of the AFC indicates that month six will have 243 truck deliveries, which when combined with the workforce of 290 workers results in the month with the most total trips. This section also indicates that the maximum truck deliveries for any one month will be 320.

DATA REQUEST

49. Please provide a table outlining the expected truck deliveries by month during the construction period.

BACKGROUND

Section 5.11.1.2 identifies the five intersections that were analyzed for the impact that construction traffic would have on their level of service. These five intersections are located around the MPP site and the primary offsite parking area.

DATA REQUEST

50. Please indicate why intersections surrounding the laydown area and the secondary offsite parking site were also not analyzed.

BACKGROUND

Section 2.11.2.2 identifies the truck trips for the delivery of hazardous material to the MPP. This section does not indicate what potential traffic routes would be used for the delivery of this material.

DATA REQUEST

- 51. Please provide information for the potential travel routes of trucks delivering hazardous material to the MPP. The route information should include but not be limited to:
 - a. the condition of the off ramp from Interstate 5,
 - b. local roadways used,
 - c. type of development along the route (commercial, residential, etc.),
 - d. intersection control (four way stop, traffic signal, etc.),
 - e. traffic hazards such as sharp turns,
 - f. locations of any sensitive receptors along the route (schools, hospital, etc.), and
 - g. railroad crossings.

BACKGROUND

AFC Section 5.13.2.4.1 indicates that the potential exists for vapor plumes to be vented from the HRSG stacks. Traffic visibility may be impaired due to vapor plumes reaching ground level on adjacent roadways. This may affect traffic safety on Interstate 5 and local roadways in the vicinity of the project site.

- 52. Please provide information based on your plume analysis for:
 - a. The roadways that may be impacted.
 - b. The expected frequency.
 - c. Traffic safety issues resulting from the plumes.
 - d. Plans to mitigate any visibility impact the plumes could have on traffic safety.

Technical Area: Visual Resources

Author: William Kanemoto

BACKGROUND

It is unclear from Figures 3.4-1 and 3.4-2 (Site Grading and Site Arrangement) in the Facility Description of the AFC which existing structures on the Site Existing Topo Plan (Figure 3.3-1) will be removed and which replaced. For example, will the Units 1 and 2 structures, and the Cooling Tower No. 3 structure remain, as depicted in Figure 3.4-2? Similarly, will the existing 78,000 gallon storage tank on the site's eastern boundary remain, be removed, or be relocated?

DATA REQUEST

53. Please provide a revised Site Arrangement Plan that clearly shows the final proposed plant layout, including all major structural removals and relocations, all new structures, reconfigured containment berms, etc.

BACKGROUND

The Facility Description of the AFC makes numerous references to an existing Unit 5. Yet no Unit 5 is depicted in Figure 3.3-1, Site - Existing Topo Plan, or subsequent figures.

DATA REQUEST

54. Please provide a new Site Existing Conditions Plan that depicts and clearly labels the location of all existing Units and their principal features, including those of Unit 5.

BACKGROUND

According to the Facility Description, a new two- or three-story administration building would be constructed. This building is not depicted in Figure 3.4-2. Site Arrangement. The description states that the new administration building will be an expansion of the existing distribution center. Neither the distribution center location nor footprint are clearly indicated on Figures 3.3-1 nor 3.4-2.

- 55. Please indicate the location and footprint of the existing distribution center on the revised Site Existing Conditions Plan requested above.
- 56. Please depict the footprint of the proposed new administration building.
- 57. Please provide scaled architectural elevations of the proposed new administration building, and further description of the proposed design, such as proposed architectural detail, material, and color.

BACKGROUND

It is unclear from the Facility Description whether reclaimed water for the project will require the construction of new water supply lines.

DATA REQUEST

58. Please clarify whether new off-site reclaimed water supply lines will be required. If so, please provide a map of the route such lines are proposed to follow.

BACKGROUND

It is unclear from the Facility Description of construction activities whether off-site staging for material or equipment will be required for construction. The description states that off-site staging will not be required for the electrical interconnection phase only, but does not state whether off-site staging would be required for the plant construction phase.

DATA REQUEST

59. Please clarify whether off-site staging and storage would be required during any phase of the project construction. If so, please provide a map or maps depicting all intended staging and storage locations at a scale of 1" = 100' or smaller.

BACKGROUND

The exact location and heights of prominent existing features on the site are necessary for purposes of comparing the anticipated effects of the new, proposed features.

DATA REQUEST

- 60. Please identify and indicate the location, in plan view, of the tall existing stack on the north-central portion of the facility.
- 61. Please provide the heights of the existing power blocks, stacks, and cooling towers of all existing units, including both existing Magnolia Units and Olive Units 1 through 4.

BACKGROUND

An architectural elevation of proposed cooling towers and administration building similar to that provided for the power plant in figure 3.4-3 was not provided in the AFC.

DATA REQUEST

62. Please provide architectural elevations of the proposed administration building and of the proposed cooling tower.

BACKGROUND

Reference is made to possible FAA lighting requirements that might apply to the proposed project, but these are not detailed.

DATA REQUEST

63. Please provide a detailed description of any FAA lighting or painting requirements that would apply to the proposed project.

BACKGROUND

An evaluation of potential visible plume effects of the project requires some understanding of the baseline condition of existing visible plumes.

- 64. Please provide a detailed characterization of visible vapor plumes of the existing SCPPA Magnolia facility.
- 65. Please identify any other existing sources of visible vapor plumes within the project viewshed.